IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

CANRUI ZHANG,

Plaintiff,

v.

THE INDIVIDUALS, CORPORATIONS, LIMITED LIABILITY COMPANIES, PARTNERSHIPS, AND UNINCORPORATED ASSOCIATES IDENTIFIED ON SCHEDULE "A,"

Defendants.

Case No. 1:24-cv-13131

Judge Jorge L. Alonso

Magistrate Judge Jeffrey T. Gilbert

JURY TRIAL DEMAND

MOTION TO WITHDRAW AS COUNSEL

Pursuant to Local Rule 83.17 of the United States District Court for the Northern District of Illinois, Bishop & Diehl, Ltd. (formerly known as Bishop Diehl & Lee, Ltd.) and attorneys Edward L. Bishop, Benjamin A. Campbell, and Sameeul Haque (collectively, the "Firm"), respectfully request that this Court grant leave to the Firm to withdraw as counsel in this matter. In support of this Motion, the Firm states as follows:

- 1. Attorney Nicholas S. Lee, who has an appearance in this matter on behalf of Plaintiff Canrui Zhang ("Plaintiff"), is no longer with the Firm.
- 2. It is the Firm's understanding that Attorney Lee's CM/ECF account has been updated to reflect his new contact information.
- 3. Plaintiff has stated to the Firm that Attorney Lee will continue to represent Plaintiff moving forward.
- 4. Insofar as Attorney Lee's appearance is an appearance on behalf of Plaintiff indicating that Plaintiff is being represented by the Firm, the record should reflect that Attorney

Lee's continued representation of Plaintiff is not on behalf of or in affiliation with the Firm. Again,

it is the Firm's understanding that Attorney Lee's CM/ECF account has already been updated to

reflect his new contact information.

5. It is expected that Attorney Lee and his new firm will file additional or amended

appearances as appropriate.

6. The requested withdrawal of counsel or stay is not being sought for delay or any

improper purpose.

7. Granting this Motion will not prejudice any parties, is not otherwise inequitable,

and will not delay or frustrate the efficient resolution of this case.

WHEREFORE, the Firm respectfully requests that this Motion to Withdraw as Counsel be

granted in all respect along with such other and further relief as is just and proper.

DATED: February 14, 2025

Respectfully submitted by,

/s/ Edward L Bishop

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Withdrawing Counsel

2

CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system this February 14, 2025. Any other counsel of record will be served by electronic mail and/or first-class mail.

/s/ Edward L. Bishop Edward L. Bishop